

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE IGLOO PRODUCTS COOLER)	C.A. No. 1:25-cv-00298-JLH
RECALL LITIGATION)	CONSOLIDATED
)	
)	
ANTHONY ZANNETTINO, KATHRYN)	C.A. No. 1:25-cv-00744-JLH
TRAINOR, ROBERT CASTELLANO,)	
AND VY NGUYEN)	
)	
Plaintiffs)	
)	
v.)	
)	
IGLOO PRODUCTS CORP.,)	
)	
Defendant)	
)	

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING CONSOLIDATION,
APPOINTMENT OF INTERIM CLASS COUNSEL, AND CONTINUING
DEFENDANT’S RESPONSIVE DEADLINE**

WHEREAS, on June 6, 2025, plaintiffs Kelsea Holton, Luis Miranda, and Kristen Riffle (“*Holton* Plaintiffs”) filed a Consolidated Class Action Complaint (D.I. 26);

WHEREAS, the deadline for defendant Igloo Products Corp. (“Defendant”) to respond to the Consolidated Class Action Complaint is July 7, 2025 (D.I. 18, D.I. dated June 6, 2025);

WHEREAS, pending in the U.S. District Court for the Central District of California was a related, consolidated putative class action filed by Plaintiffs Anthony Zannettino, Kathryn Trainor, Robert Castellano, and Vy Nguyen (“*Zannettino* Plaintiffs”) against Defendant, captioned *Zannettino v. Igloo Products Corp.*, Case No. 2:25-cv-01917-MWF-JC (“*Zannettino* Action”);

WHEREAS, on June 17, 2025, the related, consolidated *Zannettino* Action was transferred via stipulation to this Court and assigned to the Honorable Jennifer Hall, Case No. 1:25-cv-00744-JLH;

WHEREAS, the parties in both actions have conferred regarding initial case management issues concerning consolidation, the appointment of interim counsel pursuant to Fed. R. Civ. P. 23(g), the filing of an amended consolidated complaint, and Defendant's deadline to respond;

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, and subject to the approval of the Court, as follows:

1. All current responsive deadlines in the *In re Igloo* matter and in the *Zannettino* Action are vacated, with new deadlines to be set consistent with the steps described in items 2-7 below.
2. The recently-transferred *Zannettino* Action should be consolidated for all purposes pursuant to Fed. R. Civ. P. 42, with the case file for the consolidated proceedings maintained under C.A. No. 1:25-cv-00298-JLH CONSOLIDATED.
3. The *Holton* and *Zannettino* Plaintiffs shall file any stipulation or motions for interim class counsel pursuant to Fed. R. Civ. P. 23(g) within 14 days after entry of an order granting this stipulation. In order to expedite the proceedings, Plaintiffs agree to waive opposition and reply briefing on any Rule 23(g) motions for appointment as interim class counsel. By agreeing to this stipulation, Defendant does not waive any arguments or defenses concerning any issue, including whether appointment is warranted or concerning adequacy of counsel.
4. Within 14 days after an order appointing interim lead counsel, Plaintiffs will file either an amended consolidated complaint or provide notice that they do not intend to amend at this time.
5. Defendant's deadline to respond will be 30 days after the filing of an amended complaint or notice concerning non-amendment.

6. Plaintiffs will have 30 days to file opposition(s) to any Rule 12 motion(s) that Defendant files pursuant to the above schedule.
7. If any deadline falls on a weekend or holiday, it will be continued to the next business day.

/s/ R. Grant Dick IV

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Respectfully submitted,

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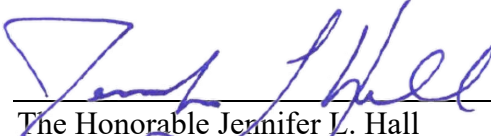
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Attorneys for Zannettino Plaintiffs

Dated: June 30, 2025

SO ORDERED THIS 2nd day of July, 2025.



The Honorable Jennifer L. Hall
United States District Judge